

## Battaglia, Frank

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**From:** Lynch, Joanne [Joanne.Lynch@aecom.com]  
**Sent:** Thursday, June 06, 2013 3:57 PM  
**To:** Battaglia, Frank  
**Cc:** Joseph Guarnaccia; Hellerich, Lucas  
**Subject:** BASF Cranston RI - SRI Workplan Addendum, Response to EPA Comments

Frank –

The following is a response to your comment regarding the Supplemental Remedial Investigation (SRI) Workplan Addendum (5/6/2013), that we discussed by phone on Thursday, May 30.

### **EPA Comment**

Please provide more discussion about how a 30 mg/kg action level was determined.

### *AECOM Response*

The SRI Workplan text and decision matrix (in Table 1) describes the use of 30 mg/kg as a decision point to determine if deeper or abutting soil grid samples on hold should be activated for analysis at River Areas 1, 2, and 3, and Central Areas 1, 2, and 3. Our intent is to consider the conceptual site model, wherein releases at surface caused PCB impacts in soil, while evaluating the soil data to ensure that the data support the release history. Specifically, if total PCB concentrations in soil are decreasing with depth then we would conclude that that is consistent with the CSM. However, if we find that PCB soil concentrations increase with depth, even if under 30 mg/kg then this would be inconsistent with a surface release and an additional sample(s) would be analyzed to characterize the extent of the PCB impacts and determine if an alternate CSM fit that area better (i.e., a specific historical operation in that area caused a subsurface release). Selecting 30 mg/kg as a vertical delineation decision point, while considering the CSM, will enable us to confirm the depth of soil that needs to be removed (i.e., the vertical extent of soil >50 mg/kg) as well as adequately delineate the future capped area.

### *AECOM Note*

On May 30, 2013, we discussed the possibility of using field screening techniques for the soil samples. BASF has decided to rely solely on analytical data, as described in the SRI Workplan Addendum.

### *Schedule*

We are tentatively scheduling field work to begin on 6/24 and run through approximately 7/10. PCB soil sampling will proceed first and will be followed by the groundwater grab and monitoring well sampling.

Thank you for your attention to this matter. With your approval, we will finalize our subs and field staff.

Best regards,  
Joanne Lynch

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